

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

CONVERGEN ENERGY WI LLC

Plaintiffs,

-against-

L'ANSE WARDEN ELECTRIC COMPANY, LLC

Defendants.

Index No.

**Dane County Circuit Court,  
Wisconsin, Case No. 2020-CV-001199**

**DECLARATION OF MICHAEL STOLPER**

I, Michael Stolper, declare:

1. My name is Michael Stolper and I am an attorney with the Seiden Law Group LLP. I am licensed to practice in the State of New York, and I submit this declaration in support of the Notice of Removal. If I were asked to testify, I would testify consistent with this declaration, and I have personal knowledge of all facts set forth herein.

2. I am counsel to Defendant, L'Anse Warden Electric Company, LLC ("L'Anse").

3. L'Anse is a Delaware limited liability company and wholly owned subsidiary of Convergen Energy, LLC.

4. Upon information and belief, Convergen Energy WI, LLC is owned by Nianticvista Energy, LLC which is owned by 4406 Cypress Lane, LLC.

5. Upon information and belief, 4406 Cypress Lane, LLC is a single member LLC owned by Gregory Merle, who is a Florida resident.

Dated this 15<sup>th</sup> day of June, 2020.

*Electronically signed by Michael Stolper*

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Michael Stolper